

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>LARYSSA JOCK, et al.,</b>	:	Index No. 1:08 CV 2875 (JSR)
	:	
Plaintiffs and Counterclaim Defendants,	:	U.S. District Judge Jed S. Rakoff
	:	
v.	:	<b><u>DECLARATION OF GERALD L.</u></b>
	:	<b><u>MAATMAN, JR., ESQ.</u></b>
	:	
<b>STERLING JEWELERS INC.,</b>	:	
	:	
Defendant and Counterclaim Plaintiff.	:	
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GERALD L. MAATMAN, JR., ESQ., being duly sworn, declares under penalty of perjury:

1. I am a member of the Bar of the State of New York and a partner in the firm of Seyfarth Shaw LLP, attorneys for Defendant and Counterclaim Plaintiff Sterling Jewelers Inc. ("Sterling") in the above-captioned case. This Declaration is submitted in support of Sterling's motion for bifurcated scheduling, consideration, and disposition of legal issues relative to the workplace dispute resolution agreement between each Plaintiff and Sterling pursuant to Rule 16 of the Federal Rules of Civil Procedure.

2. On March 18, 2008, fifteen (15) named Plaintiffs filed a class action Complaint with a jury demand purporting to represent over 20,000 putative class members for alleged gender discrimination under Title VII of the Civil Rights Act of 1964 and a collective action for alleged unequal pay under the Equal Pay Act.

3. On March 20, 2008, this Court issued its standard scheduling order setting a case conference on May 14, 2008, for the purpose of case management and scheduling.

4. On April 24, 2008, Plaintiffs' counsel filed an amended class action Complaint, which added a sixteenth plaintiff to the Complaint ("FAC"). Plaintiffs' claims in the FAC are otherwise materially indistinct from the claims in the Complaint, and the FAC also sets forth a jury demand purporting to represent over 20,000 putative class members for alleged gender discrimination under Title VII of the Civil Rights Act of 1964 and a collective action for alleged unequal pay under the Equal Pay Act.

5. On April 30, 2008, Sterling filed its initial responsive pleadings, including a counterclaim, which raise a host of legal issues relative to the impact of the workplace dispute resolution agreement (known as "RESOLVE") agreed to by each named plaintiff. (*See* Sterling's Answer, Affirmative Defenses and Counterclaim, dated April 30, 2008, Docket Entry No. 19.)

6. I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on May 2, 2008

/s/ Gerald L. Maatman, Jr.  
Gerald L. Maatman, Jr. (GM-3201)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2008, I electronically filed the foregoing  
DECLARATION OF GERALD L. MAATMAN, JR, ESQ. with the Clerk of the United States  
District Court, Southern District of New York using the CM/ECF system, which sent notification  
of such filing to the following:

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Of All Counsel for Plaintiffs

/s/ Gerald L. Maatman, Jr.  
Gerald L. Maatman, Jr.